

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

RightCHOICE Managed Care, Inc., *et al.*,

Plaintiffs,

v.

Hospital Partners, Inc.; Hospital Laboratory Partners, LLC; Empower H.I.S. LLC; RAJ Enterprises of Central Florida, LLC d/b/a Pinnacle Laboratory Services; Labmed Services, LLC; Serodynamics, LLC; David Byrns; Jorge Perez; Beau Gertz; and Mark Blake.

Defendants.

Civil Action No.  
5:18-CV-06037-DGK

**Plaintiffs’ Motion for Entry of Final Judgment as to the Sero Defendants and for a  
Hearing on Damages as to the Defaulted Defendants**

In accordance with Federal Rules of Civil Procedure 54(b) and 55(b), Plaintiffs respectfully request that: (1) upon the Court’s resolution of Plaintiffs’ Motion to Amend Judgment to Include Pre- and Post-Judgment Interest (Dkt. 785), the Court direct entry of final judgment against the Sero Defendants<sup>1</sup> as to those claims encompassed by its Judgment of September 30, 2021 (Dkt. 772); and (2) the Court schedule a hearing to determine the damages to be entered on the default judgments against the Empower Defendants,<sup>2</sup> Defendant Hospital Laboratory Partners, LLC (“Hospital Lab Partners”), and Defendant RAJ Enterprises of Central Florida, LLC d/b/a Pinnacle Laboratory Services (“Pinnacle Labs”) (collectively, Pinnacle Labs, Hospital Lab Partners, and the Empower Defendants are the “Defaulted Defendants”). This

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<sup>1</sup> LabMed Services, LLC; SeroDynamics, LLC; Beau Gertz; and Mark Blake.

<sup>2</sup> Hospital Partners, Inc.; Empower H.I.S. LLC; and Jorge Perez.

motion is based on Plaintiffs' suggestions as well as all papers, filings, and proceedings in this matter.

Dated: June 3, 2022

By: /s/ Michael L. Jente

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed electronically with the United States District Court for the Western District of Missouri, through the Court's CM/ECF system, on the 3rd day of June 2022, with notice of case activity sent to counsel of record.

/s/ Michael L. Jente